

**REMARKS**

Claims 1-15 are pending in the present application and were rejected. The rejection of these claims is respectfully traversed.

**I. Objection to Claims**

The Examiner objected to claims 3, 5, 8, 10, 13 and 15 because the Examiner stated that the terms "XPCOM and UNO" are not supported or defined in the specification or in the claims. Applicant has amended the specification to include the full titles of these abbreviations. Applicant respectfully submits that these names would have been known by those skilled in the art. Applicant respectfully submits that the claims should be in condition for allowance. No new matter is added by these amendments.

**II. 35 U.S.C. § 102(b) Anticipation Rejection of Claims**

In the outstanding Office Action, claims 1-15 were rejected under 35 U.S.C. § 102(b) as being anticipated by *Hamilton et al.* (U.S. Patent No. 5,737,607). Applicant respectfully traverses this rejection to the claims.

Claim 1, for example, recites a method for remote inter-language method calling comprising issuing a method call using a first protocol. Claim 1 further recites translating said method call from said first protocol to an intermediary protocol, and translating said method call from said intermediary protocol to a second protocol.

Applicant respectfully traverses the rejection to claim 1 at least because the cited reference *Hamilton et al.* does not disclose or suggest "translating said method call from said first protocol to an intermediary protocol" or "translating said method call from said intermediary protocol to a second protocol." *Hamilton et al.* does not disclose the use of an

intermediary protocol, as stated by the cited portion of the patent. (Col. 7, ll. 48-52). Rather, in *Hamilton et al.*, “the Java ORB implementation of the preferred embodiment must be able to communicate directly with both Sun’s Distributed Object Environment (DOE) and with the Spring distributed operation system.” (Col. 7, ll. 48-52; emphasis added). As explicitly stated in *Hamilton et al.*, the communication must be direct and is not translated into an intermediary protocol first before being translated into another protocol.

Furthermore, each system in *Hamilton et al.* must have specific components for communicating directly with each other system. For example, as shown on Figure 3, Java has components (e.g., Spring Marshal Buffer 60, Spring Proxy Protocol 56, Singleton subcontract 66, Caching subcontract 64) specifically for communicating with Spring, and additional components (e.g., DOE BOA Subcontract 62, DOE Marshal Buffer 58, DOE ONC RPC 54) specifically for communicating with DOE. As disclosed in *Hamilton et al.*, each of these systems (e.g., Spring and DOE) would need similar components for specifically communicating with each other system. As a result, the addition of another system requires the addition of system-specific components for each other system (e.g., Java, Spring, DOE) for communication. Moreover, any change in a system would necessitate the change of the components of all of the other systems to communicate with that system. These problems (Application, p. 2, ll. 19-21; p. 3, ll. 10-18) may be avoided by, for example, translation to a single intermediate protocol, as required by claim 1.

As discussed above, *Hamilton et. al.* does not disclose or suggest “translating said method call from said first protocol to an intermediary protocol” and “translating said method call from said intermediary protocol.” Accordingly, Applicant respectfully requests that the

rejection of claim 1 be withdrawn. With respect to claim 2-5, these claims depend from claim 1, and are therefore patentable, at least for the same reason.

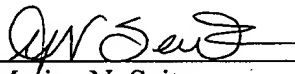
For reasons stated above with respect to claim 1, Applicant submits that the rejection of independent claims 6 and 11 should be withdrawn. With respect to claims 7-10 and 12-15, these claims depend from claims 6 and 11 respectively, and are therefore patentable, at least for the same reason.

### **III. Conclusion**

In view of the above amendments and remarks, Applicant submits that all claims are clearly allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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By:   
Marina N. Saito  
Registration No. 42,121  
SONNENSCHN NATH & ROSENTHAL LLP  
P.O. Box 061080  
Wacker Drive Station, Sears Tower  
Chicago, Illinois 60606-1080  
(312) 876-8000